

Message

From: Malagon, Hector [Malagon.Hector@epa.gov]
Sent: 8/31/2020 3:51:05 PM
To: Daniel Liebowitz [Daniel.Liebowitz@allnex.com]; Colette Moulaert [Colette.Moulaert@allnex.com]
CC: Master, Barbora [Master.Barbora@epa.gov]; Snyderman, Steven [Snyderman.Steven@epa.gov]; Edelstein, Rebecca [Edelstein.Rebecca@epa.gov]
Subject: Update on P-19-0049

Importance: High

Hi Daniel

This is an update of the restrictions in the Consent Order for P-19-0049.

Consent Order include the following restrictions:

- 1- "No **manufacture or process** in a method that generate vapor, spray, dust mist or aerosol". (different language for this restriction could say: "**not manufacture or process in a method that generate inhalation exposures to workers**").
- 2- Use as stated in the PMN with maximum concentration of the component in formulation, as stated in the PMN. **(this is the component stated in the health report you received. Call me and I can tell you which one is. I cannot put CBI here)**
- 3- Water trigger for 1 ppb (releases to water as long as the concentration in water of the PMN does not exceed 1 ppb)

Under these conditions, no testing is required at all. I need to know if these conditions are OK for the submitter.

- In bullet 1, I need to know which language is more preferred.
- In bullet 3, I need to know if submitter is OK with the water trigger. **If the submitter is not OK, I will need to change the order to upfront ecotoxicity testing.**

I will give you some similar update for 75 as soon as I receive confirmation from management.

Best regards,

<<< PLEASE DO NOT TRANSMIT ANY INFORMATION >>>
<<< CONSIDERED CBI TO THIS EMAIL ADDRESS >>>

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